

***IN THE DISTRICT COURT OF THE UNITED STATES  
For the Western District of New York***

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**OCTOBER 2013 GRAND JURY  
(Impaneled 10/28/13)**

**THE UNITED STATES OF AMERICA**

**INDICTMENT**

**-vs-**

**Violations:**

**ALEXANDER GREEN**

(Counts 1, 2)

**CHARLES GREEN**

(Counts 1, 2)

**MICHAEL AMALFI, JR.**

(Counts 1, 2)

**CHRISTOPHER ALVINO**

(Count 1)

**PETER WILK**

(Count 1)

**MICHAEL MARCIANO**

(Count 1)

21 U.S.C. § 846;

18 U.S.C. § 1956(h)

(2 Counts)

**COUNT 1**

**(Narcotics Conspiracy)**

**The Grand Jury Charges That:**

Beginning in or about January 2010, the exact date being unknown to the Grand Jury, and continuing thereafter up to the date of the return of this Indictment, in the Western District of New York, and elsewhere, the defendants, **ALEXANDER GREEN, CHARLES GREEN, MICHAEL AMALFI, JR., CHRISTOPHER ALVINO, PETER WILK** and **MICHAEL MARCIANO**, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown to the Grand Jury, to commit the

following offenses, that is, to possess with the intent to distribute, and to distribute, 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**All in violation of Title 21, United States Code, Section 846.**

**COUNT 2**

**(Money Laundering Conspiracy)**

**The Grand Jury Further Charges That:**

Beginning in or about January 2010, the exact date being unknown to the Grand Jury, and continuing thereafter up to the date of the return of this Indictment, in the Western District of New York, and elsewhere, the defendants, **ALEXANDER GREEN, CHARLES GREEN** and **MICHAEL AMALFI, JR.**, did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offense, namely, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, that is, the transfer, delivery and disposition of currency, which involve the proceeds of specified unlawful activity, that is, the unlawful distribution of marijuana, a Schedule I controlled substance, and conspiracy to do so, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, with the intent to promote the carrying on of said specified unlawful activity, and while knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**All in violation of Title 18, United States Code, Section 1956(h).**

**FIRST FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of the offenses alleged in Count One of this Indictment, the defendant, **ALEXANDER GREEN, CHARLES GREEN, MICHAEL AMALFI, JR., CHRISTOPHER ALVINO, PETER WILK** and **MICHAEL MARCIANO** shall forfeit to the United States any property which constitutes or is derived from proceeds the defendant obtained, directly or indirectly, as the result of the controlled substance offense alleged in Count One or was used or intended to be used in any manner or part to commit or to facilitate the commission of such offense.

If any of the property described above, as a result of any act or omission of the defendants;

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

**All pursuant to the Title 21, United States Code, Sections 853(a)(1) and (a)(2) and Title 21, United States Code, Section 853(p).**

**SECOND FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of the offense set forth in Count 2 of this Indictment, the defendants, **ALEXANDER GREEN, CHARLES GREEN and MICHAEL AMALFI, JR.**, shall forfeit to the United States, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

If any of the property described above, as a result of any act or omission of the defendants;

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to and Title 28, United States Code, Section 2461(c).

**All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p).**

DATED: Rochester, New York, March 27, 2014.

WILLIAM J. HOCHUL, JR.  
United States Attorney

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A TRUE BILL:

s/Foreperson  
FOREPERSON